

REMARKS/ARGUMENTS

Claims 1-28 are pending in the application. The Examiner has rejected Claims 1, 2, 4-9, 13-19, 21-26 and 28. The Examiner has objected to Claims 3, 10-12, 20 and 27. Applicant respectfully requests reconsideration of pending claims 1-28.

The Examiner has objected to the drawings as failing to comply with 37 CFR 1.84(p)(4), alleging reference character "210" has been used to designate both Reassembly Circuitry (as shown in Fig. 2) and routing circuitry as described in the specification page 5, line 25. Applicant submits Applicant amended paragraph 3 on page 5, lines 23-28, of the specification in Applicant's response to the previous Office action in which the same objection was raised. Specifically, Applicant amended page 5, lines 23-28, to recite "reassembly circuitry 210." As Applicant stated, Applicant submits no new matter has been added, as the amendment is consistent with Fig. 2, as well as page 6, lines 8 and 25, and page 7, lines 20 and 28, for example. Thus, Applicant submits the drawing objection under 37 CFR § 1.84(p)(4) has been obviated.

The Examiner has objected to the drawings as failing to comply with 37 CFR 1.84(p)(5), alleging they do not include the following reference sign(s) mentioned in the description: Reference character (580) described in page 11, line 13 for Fig. 3. Applicant submits Applicant amended Figure 3 in Applicant's response to the previous Office action in which the same objection was raised. Specifically, Applicant noted reference character 580 was included in the originally filed Figure 3 and underlined to indicate it comprised elements depicted in Figure 3. To reflect what is already stated in the description of Figure 3 on page 10, lines 1 and 2, namely, "Figure 3 illustrates a block diagram of an alternate embodiment of an egress line card 580," Applicant added a dashed-line box to Figure 3, which Applicant submits does not add new matter. Thus, Applicant submits the drawing objection under 37 CFR § 1.84(p)(5) has been obviated.

The Examiner has rejected claims 1, 2, 4-8, 18, 19, and 21-25 under 35 U.S.C. 103(a) as being unpatentable over Aramizu et al. (U.S. Patent No. 6,493,356) in view of Ganmukhi et al. (U.S. Patent No. 6,233,243). Applicant respectfully disagrees. Applicant notes the Examiner restates, practically verbatim, the same rejection as in the previous Office action yet provides no response to Applicant's arguments presented in Applicant's response to the previous Office action. Accordingly, Applicant reiterates Applicant's previously presented arguments.

Regarding claims 18, 19, and 21-25, as Applicant noted in response to the previous Office action, Applicant submits the Examiner has failed to present a *prima facie* showing of alleged obviousness. Applicant notes MPEP § 2142 states, in part, “To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.” Applicant notes claim 18 recites “...wherein the memory stores operating instructions that, when executed by the processing module, cause the processing module to perform functions that include: storing the first cell in a buffer; updating the reassembly context to reflect storage of the first cell in the buffer; receiving subsequent cells of the packet; storing each of the subsequent cells in the buffer; updating the reassembly context as each subsequent cell is stored in the buffer....” As Applicant noted in Applicant’s response to the previous Office action, Applicant finds no allegation by the Examiner that the cited references teach or suggest the above-noted limitation recited in claim 18. Thus, Applicant submits the Examiner has not asserted that the references when combined teach or suggest all the claim limitations. Accordingly, Applicant submits the Examiner has not presented a *prima facie* showing of alleged obviousness in accordance with MPEP § 2142. Thus, Applicant submits the cited portions of the cited references, either alone or in combination, fail to anticipate or render obvious the claimed invention as set forth in claim 18.

Regarding claims 19 and 21-25, Applicant notes such claims depend from independent claim 18. Applicant has presented arguments for the allowability of claim 18. Moreover, Applicant reiterates arguments with respect to claims 19 and 21-25, individually, in Applicant’s response to the previous Office action, for which the Examiner does not provide a response to Applicant’s arguments. Thus, Applicant submits claims 19 and 21-25 are also in condition for allowance.

Regarding claims 1, 2, and 4-8, the Examiner states, “claims 1-2 and 4-8 are analyzed and rejected as previously discussed with respect to claims 18-19 and 21-25.” However, as Applicant states above, Applicant submits the Examiner’s purported analysis and purported rejection of claims 18, 19, and 21-25 does not appear to present a *prima facie* showing of obviousness pursuant to MPEP § 2142. Accordingly, Applicant submits the Examiner’s apparent attempt to rely on such purported analysis and purported rejection to attempt to justify purported rejection of claims 1, 2, and 4-8 also

fails to present a *prima facie* showing of obviousness with respect to claims 1, 2, and 4-8. Thus, Applicant submits claims 1, 2, and 4-8 are in condition for allowance.

For example, Applicant can find no specific allegation with respect either to claims 18, 19, and 21-25 or claims 1, 2, and 4-8 as to either cited reference, either alone or in combination, teaching or suggesting "allocating a reassembly context to the selected source," "updating the reassembly context to reflect storage of the first-cell in the buffer," "receiving subsequent cells of the packet," and "updating the reassembly context as each subsequent cell is stored in the buffer," as recited in claim 1. Thus, Applicant submits the Examiner has not asserted that the references when combined teach or suggest all the claim limitations. Accordingly, Applicant submits the Examiner has not presented a *prima facie* showing of alleged obviousness in accordance with MPEP § 2142. Thus, Applicant submits the cited portions of the cited references, either alone or in combination, fail to anticipate or render obvious the claimed invention as set forth in claim 1.

Regarding claims 2 and 4-8, Applicant notes such claims depend from independent claim 1. Applicant has presented arguments for the allowability of claim 1. Thus, Applicant submits claims 2 and 4-8 are also in condition for allowance.

Moreover, while claim 2 recites "...wherein the reassembly context includes a head pointer and a tail pointer corresponding to the packet as stored in the buffer, wherein the packet is stored as a linked list in the buffer," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 2. As examples, Applicant can find no assertions by the Examiner regarding "a head pointer," "a tail pointer," or "a linked list." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 2. Thus, Applicant submits claim 2 is in condition for allowance.

Also, while claim 4 recites "...wherein allocating the reassembly context further comprises allocating the reassembly context from a set of reassembly contexts," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 4. As an example, Applicant can find no assertion by the Examiner regarding "allocating the reassembly context from a set of reassembly contexts." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 4. Thus, Applicant submits claim 4 is in condition for allowance.

Further, while claim 5 recites "...wherein a number of reassembly contexts in the set of reassembly contexts is fewer than a number of sources of the plurality of sources," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 5. Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 5. Thus, Applicant submits claim 5 is in condition for allowance.

Also, while claim 6 recites "...wherein queuing the reassembled packet further comprises passing at least one control cell to a traffic management device that controls transmission of packets to at least a portion of the plurality of destinations," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 6. As an example, Applicant can find no assertion by the Examiner regarding "passing at least one control cell to a traffic management device that controls transmission of packets to at least a portion of the plurality of destinations." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 6. Thus, Applicant submits claim 6 is in condition for allowance.

Moreover, while claim 7 recites "...wherein queuing the reassembled packet further comprises queuing the reassembled packet for transmission to multiple destinations of the plurality of destinations," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 7. As an example, Applicant can find no assertion by the Examiner regarding "multiple destinations." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 7. Thus, Applicant submits claim 7 is in condition for allowance.

Moreover, while claim 8 recites "...wherein queuing the reassembled packet further comprises changing encapsulation of the reassembled packet," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 8. As an example, Applicant can find no assertion by the Examiner regarding "...changing encapsulation of the reassembled packet." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 8. Thus, Applicant submits claim 8 is in condition for allowance.

For the foregoing reasons, Applicant submits claims 2 and 4-8 are not anticipated or rendered obvious by the cited portions of the cited references, either alone or in combination. Therefore, Applicant submits claims 2 and 4-8 are in condition for allowance.

The Examiner has rejected claims 9, 13-17, 26, and 28 under 35 U.S.C. 103(a) as being unpatentable over Aramizu et al. (U.S. Patent No. 6,493,356) as applied to the claims above, and further in view of O'Neill et al. (U.S. Patent No. 6,243,382). Applicant respectfully disagrees. Applicant notes the Examiner restates, practically verbatim, the same rejection as in the previous Office action yet provides no response to Applicant's arguments presented in response to the previous Office action. Accordingly, Applicant reiterates Applicant's previously presented arguments.

Regarding claims 9, 13-17, 26, and 28, as Applicant noted previously, while the Examiner states, "Aramizu and Ganmukhi disclose the claimed limitations discussed in paragraph 5 above," Applicant has presented reasons above as to why the Examiner has failed to present a *prima facie* showing of obviousness in paragraph 5 of the Office action and why the cited portions of the cited references, either alone or in combination, fail to anticipate or render obvious the claimed invention as set forth in claims 1, 2, 5-8, 18, 19, and 21-25. Moreover, Applicant notes claims 9, 13-17, 26, and 28 are not dependent from any of claims 1, 2, 5-8, 18, 19, and 21-25 and are not identical to any of those claims. Thus, Applicant submits the Examiner cannot rely upon paragraph 5 of the Office action as establishing a *prima facie* showing of obviousness with respect to claims 9, 13-17, 26, and 28.

Applicant notes the Examiner has not provided a response to Applicant's arguments set forth in Applicant's response to the previous Office action. Moreover, Applicant submits the Examiner has not asserted that the references when combined teach or suggest all the claim limitations of claims 9, 13-17, 26, and 28. Accordingly, Applicant submits the Examiner has not presented a *prima facie* showing of alleged obviousness in accordance with MPEP § 2142. Thus, Applicant submits the cited portions of the cited references, either alone or in combination, fail to anticipate or render obvious the claimed invention as set forth in claims 9, 13-17, 26, and 28.

Regarding claim 9, Applicant submits the Examiner fails to allege the cited references, either alone or in combination, teach or suggest, for example, "a context table that stores a plurality of reassembly contexts." As another example, Applicant submits the Examiner fails to allege the cited references, either alone or in combination, teach or suggest "routing circuitry operably coupled to the context table, the traffic management block, and the buffer, wherein the routing circuitry is operably

coupled to receive cells corresponding to a source, wherein for a first cell received for a packet from the source, the routing circuitry allocates a first reassembly context to the source and stores the first cell in the buffer and updates the first reassembly context to reflect the storage of the first cell, wherein for subsequent cells of the packet, the routing circuitry stores the subsequent cells in the buffer and updates the first reassembly context to reflect storage of the subsequent cells, wherein when a final cell for the packet is received, the routing circuitry: stores the final cell in the buffer; updates the first reassembly context to reflect storage of the final cell; provides an indication to the traffic management block that the packet corresponding to the first reassembly context is ready for transmission; and deallocates the first reassembly context. Accordingly, Applicant submits the Examiner has not presented a *prima facie* showing of alleged obviousness in accordance with MPEP § 2142. Thus, Applicant submits the cited portions of the cited references, either alone or in combination, fail to anticipate or render obvious the claimed invention as set forth in claim 9.

Also, while claim 13 recites "... wherein cells received for the packet are stored in the buffer as a linked list, and wherein the first reassembly context stores a head pointer and a tail pointer corresponding to the linked list," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 13. As examples, Applicant can find no assertions by the Examiner regarding "a head pointer," "a tail pointer," or "a linked list." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 13. Thus, Applicant submits claim 13 is in condition for allowance.

Moreover, while claim 14 recites "...wherein the traffic management block includes a plurality of queues, wherein the traffic management block queues packets awaiting transmission in one of the plurality of queues prior to transmission," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 14. As an example, Applicant can find no assertion by the Examiner regarding "wherein the traffic management block includes a plurality of queues, wherein the traffic management block queues packets awaiting transmission in one of the plurality of queues prior to transmission." Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 14. Thus, Applicant submits claim 14 is in condition for allowance.

Moreover, while claim 15 recites "...wherein the routing circuitry provides the indication to the traffic management block that the packet corresponding to the first reassembly context is ready for

transmission by providing a control cell to the traffic management block,” Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 15. As an example, Applicant can find no assertion by the Examiner regarding “wherein the routing circuitry provides the indication to the traffic management block that the packet corresponding to the first reassembly context is ready for transmission by providing a control cell to the traffic management block.” Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 15. Thus, Applicant submits claim 15 is in condition for allowance.

Moreover, while claim 16 recites “...wherein the routing circuitry provides multiple control cells to the traffic management block for the packet such that the traffic management block transmits the packet over multiple egress connections,” Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 16. As an example, Applicant can find no assertion by the Examiner regarding “wherein the routing circuitry provides multiple control cells to the traffic management block for the packet such that the traffic management block transmits the packet over multiple egress connections.” Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 16. Thus, Applicant submits claim 16 is in condition for allowance.

Moreover, while claim 17 recites “...wherein the routing circuitry provides the traffic management block with encapsulation modification information, wherein the traffic management block modifies encapsulation of the packet prior to transmission on at least one of the multiple egress connections,” Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 17. As an example, Applicant can find no assertion by the Examiner regarding “wherein the routing circuitry provides the traffic management block with encapsulation modification information” or “wherein the traffic management block modifies encapsulation of the packet prior to transmission on at least one of the multiple egress connections.” Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 17. Thus, Applicant submits claim 17 is in condition for allowance.

Moreover, Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 26. As an example, Applicant can find no assertion by the Examiner regarding “...routing circuitry

operably coupled to receive cells corresponding to a plurality of sources, wherein for a first cell received for a packet from a particular source of the plurality of sources, the routing circuitry assigns allocates a reassembly context to the packet and outputs the cell with an indication as to the reassembly context allocated, wherein for subsequent cells received for the packet, the routing circuitry determines that the subsequent cells correspond to the packet and outputs the subsequent cells with the indication of the reassembly context, wherein for a final cell received for the packet, the routing circuitry determines that the final cell corresponds to the packet and outputs the final cell with the indication as to the reassembly context and an indication corresponding to at least one destination....” As another example, Applicant can find no assertion by the Examiner regarding “...a traffic management block operably coupled to the buffer and the routing circuitry, wherein the traffic management block receives cells from the routing circuitry with accompanying indications, wherein the traffic management block maintains a plurality of reassembly contexts for reassembling packets in the buffer, wherein the traffic management block stores received cells in the buffer at locations corresponding to the plurality of contexts, wherein when a final cell for a completed packet is received, the traffic management block queues the completed packet for transmission over the at least one egress connection included with the final cell for the completed packet as received from the routing circuitry, wherein the traffic management block.” Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 26. Thus, Applicant submits claim 26 is in condition for allowance.

Furthermore, while claim 28 recites "...wherein the routing circuitry deallocates reassembly contexts corresponding to packets when final cells for the packets are received," Applicant can find no assertion by the Examiner that either cited reference, alone or in combination, discloses or renders obvious the features of the present invention as set forth in claim 28. As an example, Applicant can find no assertion by the Examiner regarding “wherein the routing circuitry deallocates reassembly contexts corresponding to packets when final cells for the packets are received.” Thus, Applicant submits the Examiner has failed to present a *prima facie* showing of obviousness with respect to claim 28. Thus, Applicant submits claim 28 is in condition for allowance.

For the foregoing reasons, Applicant submits claims 9, 13-17, 26, and 28 are not anticipated or rendered obvious by the cited portions of the cited references, either alone or in combination. Therefore, Applicant submits claims 9, 13-17, 26, and 28 are in condition for allowance.

The Examiner has objected to claims 3, 20, 10-12, and 27 as being dependent upon rejected base claims, but states they would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims. As Applicant has presented arguments for the allowability of the base claims and intervening claims, Applicant submits claims 3, 20, 10-12, and 27 are also in condition for allowance.

In conclusion, Applicant has overcome all of the Office's rejections, and early notice of allowance to this effect is earnestly solicited. If, for any reason, the Office is unable to allow the Application on the next Office Action, and believes a telephone interview would be helpful, the Examiner is respectfully requested to contact the undersigned attorney.

Respectfully submitted,

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